



GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

BRIAN C. STEED
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

December 6, 2019

Howard Strand, Field Office Director
Office of Surface Mining
1999 Broadway, Suite 3320
Denver, CO 80202-3050

Subject: Final Phase III Bond Release, Canyon Fuel Company, LLC, Gordon Creek 2, 7 & 8 Mine, C/007/0016, Task #6001

Dear Mr. Strand:

Enclosed is the Division's Decision Document for the Phase III bond release of the final 34.15 acres of the Gordon Creek 2, 7 & 8 Mine. Canyon Fuel Company, LLC has requested bond release. The Division finds Canyon Fuel Company, LLC has met the regulatory requirements for Phase III bond release and recommends approval. We request the Office of Surface Mining's concurrence with this determination. A copy of the Phase III bond release inspection report is included in this package along with the documentation of events. Please provide your determination at your earliest convenience.

If you have any questions or need further information, please feel free to call me at (801) 538-5350.

Sincerely,

Steve Christensen
Coal Program Manager

SKC/ss
Enclosure

cc: Alexis Long, OSM Denver Field Office
Chris Hansen, Canyon Fuel Company, LLC
O:\007016.GC2\WG6001 PHASE III FINAL\Decision Document\001 OSM concurrence ltr.doc



Phase III Bond Release
Remaining 34.15 Acres
Canyon Fuel Company, LLC
Gordon Creek 2, 7 & 8 Mine
C/007/0016
Carbon County, Utah

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DECISION DOCUMENT

Phase III Bond Release
Remaining 34.15 Acres
Canyon Fuel Company, LLC
Gordon Creek 2, 7 & 8 Mine
C/007/0016
Carbon County, Utah

ACTION

Final Phase III bond release is requested for the remaining 34.15 acres at the Gordon Creek 2, 7 & 8 Mine. The Permittee has applied for bond release of the remaining posted bond in the amount of \$171,000.

BACKGROUND

The Gordon Creek 2, 7 & 8 Mine is located approximately 20 miles northwest of Price, Utah.

The mine permanently closed in 1990. Reclamation started in 1995 and continued through November 26, 1998. The permit area was reduced from 2286 acres to 180 acres in 2001 due to the termination of federal leases. Phase I bond release was approved on October 9, 2003. Phase III bond release at the Sweet's Pond was also approved on October 9, 2003. Phase II bond release was approved in March 2007 and the sediment ponds were removed and reclaimed in October 2007.

The remaining 34.15 acres has met the required liability period. Canyon Fuel Company, LLC is now seeking final bond release on the remaining 34.15 acres.

CHRONOLOGY FOR PHASE III BOND RELEASE

October 15, 2019	Canyon Fuel Company, LLC submits the Final Phase III bond release application for the Gordon Creek 2, 7 & 8 Mine remaining 34.15 acres.
October 15, 2019	The Division determined the bond release application to be administratively complete and approves the newspaper notice for publication.
October 15, 2019	Canyon Fuel Company, LLC sends letters to local governments, planning agencies, surface owners, and subsurface owners, notifying them of the proposed bond release:

Mark Jacob, Jacob Family Ranch, LLC
Pete Jr. and Sharon Stamatakis
Hidden Splendor Resources
Nielsen, LLC
Carbon County Planning and Zoning
Howard Strand, Office of Surface Mining
Mark Stilson, State of Utah, Division of Water Rights
Price River Water Improvement District
State of Utah, Division of Wildlife Resources
Steven Falk, Bureau of Land Management
Carbon County Commissioners

October 16, 23 and 30, and November 6, 2019	Phase III Bond Release Published in the ETV Newspaper.
October 17, 2019	The Division sends letters of invitation for the bond release inspection to be held October 31, 2019.
October 31, 2019	Phase III bond release inspection. In attendance: Gregg Galecki, Canyon Fuel Company, LLC Chris Hansen, Canyon Fuel Company, LLC Ryan Wilson, Canyon Fuel Company, LLC Vicky Miller, Canyon Fuel Company, LLC Tom Medlin, Office of Surface Mining Steve Christensen, Division of Oil, Gas and Mining Amanda Daniels, Division of Oil, Gas and Mining Todd Miller, Division of Oil, Gas an Mining
December 6, 2019	Public comment period closes: The Division receives no comments.

SUMMARY OF FINDINGS

The Phase III bond release was advertised for four consecutive weeks. No comments were received during the public comment period. A bond release inspection was conducted on October 31, 2019. No problems were identified. The technical analysis for Phase III bond release is attached.

PHASE III BOND RELEASE RECOMMENDATION

The Permittee has demonstrated the establishment of vegetation at the 34.15 acres. The recommendation is that the Division approve the final Phase III bond release for the Gordon Creek 2, 7 & 8 Mine. The Permittee has applied for a bond release for the remaining posted bond in the amount of \$171,000.



State of Utah

DEPARTMENT OF NATURAL RESOURCES

BRIAN C. STEED
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Technical Analysis and Findings

Utah Coal Regulatory Program

December 3, 2019

PID: C0070016
TaskID: 6001
Mine Name: GORDON CREEK 2, 7 & 8 MINES
Title: PHASE III FINAL BOND RELEASE

Summary

The application for Phase III bond release meets the Utah R645-301-880 requirements for bond release. The Phase III bond release of 34.15 acres disturbed by the Gordon Creek 2,7,8 mine is accompanied by a public notice and landowner notice, a map of the disturbed area, and a statement that all reclamation activities were accomplished as required. Phase I bond release was approved on October 9, 2003. Phase III bond release at the Sweet's Pond was also approved on October 9, 2003. Phase II bond release was approved in March 2007 and the sediment ponds were removed and reclaimed in October 2007.

pburton

Reclamation Plan

Topsoil and Subsoil

Analysis:

The application for Phase III bond release meets the Utah R645-301-250 soil handling performance standard requirements. These requirements are described in the Mining and Reclamation Plan, Chap 3, Section 3.5 Reclamation Plan and Chapter 8, Section 8.8 Plan for soil redistribution and Section 8.9 soil sampling and Section 8.10 soil amendments.

Final reclamation topography is portrayed on Plate 3-7. The location of buried coal mine waste is indicated on this plate. Cross-sections are provided in Plates 3-8A through H. In 2015 channel erosion was controlled at locations shown on Plate 3-13.

pburton

Hydrological Information Reclamation Plan

Analysis:

The application meets the State of Utah R645 requirements for Hydrological Information: Reclamation.

The Gordon Creek 2, 7, & 8 permit area contains a main drainage channel traveling the length of the permit area, and has 7 side drainage that join with this channel. Of these drainages, SD-6, required some repair work in 2016 after a storm that greatly exceeded a 100-year, 6 hour precipitation event. However, since that time all diversions have been stable and been operating as designed. The reclaimed mine site also contains one small pond that is remaining in place. Designated as "Jacob's Pond" a depression acts as a small stock watering pond and is fed by an adjacent natural seep.

Jacob's Pond has remained stable and in good condition throughout the reclamation period.

In addition to the maintained stability and good condition of the reclamation work, the mine has had many years of post-mining water monitoring. Specifically, 4 stream sites (2-2-W, 2-7-W, 2-8-W, and 2-9-W) have been monitored quarterly for well over 20 years. This monitoring has not shown any impacts from mining.

adaniels

Revegetation General Requirements

Analysis:

The application meets the State of Utah R645-301-356 requirements for Revegetation General Requirements.

The Gordon Creek #2, 7, & 8 mine site was reclaimed in the late 1990s with final seeding occurring in October 1999. The liability period passed over the next decade with quantitative vegetation sampling and analysis occurring in 2009 and 2010. With a post-mining land use of grazing, total living plant cover along with living biomass production are the primary factors considered when establishing success standards for reclamation.

The 2009 sampling of the site revealed total living plant cover of the reclaimed site was 72%, comprised mostly of forbs and grasses. The living cover of the reference area was estimated to be 41%, mostly grasses and shrubs. Total biomass production for the reclaimed area was calculated to be 1,164 lbs./ac., of which 1,139 lbs. came from forbs and grasses. This compares to the reference area which was estimated at 850 lbs./ac. of total biomass production, with only 603 lbs. of that coming from herbaceous forbs and grasses.

The 2010 sampling of the site revealed total living plant cover of the reclaimed site was 62%, comprised almost entirely of forbs and grasses. The living cover of the reference area was estimated to be 42%, again mostly grasses and shrubs. Total biomass production for the reclaimed area was calculated to be 1,086 lbs./ac., of which 1,041 lbs. came from herbaceous forbs and grasses. This compares to the reference area which was estimated at 599 lbs./ac. of total biomass production, with 398 lbs. coming from herbaceous species. These numbers, combined with the numbers from the previous year, reflect a reclaimed site that had far exceeded the minimum success standards established by the reference area. The results indicated a site ready for a Phase III bond release.

However, due to a variety of factors, a Phase III bond release application was never filed with the Division and, in September 2014, a significant precipitation event occurred at the mine site which necessitated repair and re-seeding of a portion of the permit area. Finally, in 2019, the company approached the Division seeking Phase III bond release for the 34.15 acres of remaining permitted land. Due to the time that had elapsed, and the unknown impact of the 2014 precipitation event, the Division recommended another quantitative analysis of the reclaimed site in 2019 prior to bond release. This request was made in order to confirm that the stability and quality of the revegetation of the site in 2019 was still representative of what was sampled in the 2009 and 2010 surveys. This was agreed to by the company and a copy of the 2019 report is included in this bond release application.

The 2019 report further indicated the health of the site's vegetation, beyond even what was reported a decade ago. The total living cover of the reclaimed site in 2019 was 69%, comprised mostly of forbs and grasses. The living cover of the reference area was estimated to be 45%, still mostly grasses and shrubs. Total biomass production for the reclaimed area in 2019 was measured to be 2,531 lbs./ac., of which 1,982 lbs. came from herbaceous species. This compares to the estimated 1,328 lbs./ac. of total annual production of the reference site, 790 lbs. of which come from herbaceous plants. The 2019 report also finds greater species diversity and species richness at the site compared to the reference area as well as compared to the findings of 2009 and 2010. All of these findings confirm and further the 2009 and 2010 findings and indicate the site has achieved success in its post-mining land use category of livestock grazing.

tmiller

Bonding and Insurance General

Analysis:

The application meets the State of Utah R645 requirements for General Insurance and Bonding.

The application satisfies the requirements for R645-301-820 and R645-301-890 because the reclamation bond and insurance policy on file with the Division have been maintained current. The current reclamation bond amounts to

\$171,000 and is held through Ironshore Indemnity Inc. Liability insurance is held through Great Midwest Insurance Co. and is set to expire on February 1, 2020.

A recent inspection by the Division determined that the entire disturbed area appeared stable and the reclamation efforts completed by the Permittee successful. Narrative on page 101 of the Phase III Bond Release application states that the current reclamation bond will be reduced from \$171,000 to zero dollars once bond release is approved.

jeatchel

PROOF OF PUBLICATION AFFIDAVIT

I, Traci Bishop, being first duly sworn, state that I am the Associate Editor of ETV News, a weekly newspaper of general circulation published at Price, County of Carbon, State of Utah; and that the advertisement or notice, a printed copy of which is attached hereto, was printed and published in said newspaper for one issue and on www.utahlegals.com website as follows:

October 16, 2019

October 23, 2019

October 30, 2019

November 6, 2019



Traci Bishop, Associate Editor

Subscribed to and sworn before me this 20th day of November,
2019.



Notary Public



**PUBLIC NOTICE
APPLICATION FOR PHASE III BOND
RELEASE FOR REMAINING 34.15 ACRES OF
RECLAIMED SURFACE
CANYON FUEL COMPANY, LLC GORDON
CREEK 2, 7 & 8 MINES
PERMIT C/007/0016**

Notice is hereby given that Canyon Fuel Company, LLC, 9815 South Monroe St. Suite 203, Sandy, Utah 84070 has filed an application with the Utah Division of Oil, Gas & Mining (Division) for Phase III Bond Release for the remaining 34.15 acres of reclaimed lands at the Gordon Creek 2, 7 & 8 Mines. The Mine's permit number is C/007/0016. The Mining Permit for this mine was renewed for 5 years on August 28th, 2019. Canyon Fuel Company, LLC (CFC) has fulfilled the necessary requirements contained within the mine's Mining and Reclamation Plan to obtain Phase III Bond Release for the remaining disturbed acres associated with the mine. All areas for bond release have met the requirements as described in the Utah Coal Rules R645-301-400 and R645-301-880.330. The legal description of the permit area for which bond release has been applied follows:

Township 13 South, Range 8 East, SLBM, Utah.
Section 18: N2SE4, N2SW4SE4, S2NE4SW4,
SE4SW4, SE4SW4SW4

Coal mining ceased at the mines in late 1990, the portals sealed in 1992, and approximate original contour and natural drainages re-established in August 1997. Reclamation Phase I Bond Release was obtained for the entire mine site along with Phase III Bond Release of the Sweet's Pond Area in October 2003. Vegetation success standards were achieved and no contribution of additional suspended solids to receiving stream flows or runoff outside the permit was occurring by late 2005. Phase II Bond Release was approved for the remaining reclaimed mine acreage in March 2007.

The current amount of the surety bond for the 34.15 acres of reclaimed land is \$171,000. The Division will evaluate the proposal for bond release to determine if it meets all the criteria set forth for Phase III Bond Release in the Utah Coal Mining Rules. Written comments, objections and requests for public hearing or informal conference on this proposal may be addressed to:

Utah Coal Program
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Ut 84114-5801

Said comments must be submitted thirty (30) days from the date of the last publication of this notice. This notice is being published to comply with the Surface Mining Control and Reclamation Act of 1997, and State and Federal regulations promulgated pursuant to said Act.

Published in the ETV News October 16, 23 and 30, and November 6, 2019.



GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

Inspection Report

Permit Number:	C0070016
Inspection Type:	BOND RELEASE
Inspection Date:	Thursday, October 31, 2019
Start Date/Time:	10/31/2019 10:00:00 AM
End Date/Time:	10/31/2019 12:00:00 PM
Last Inspection:	Wednesday, July 31, 2019

Inspector: Todd Miller

Weather: Cold, clear, 20F

InspectionID Report Number: 6563

Accepted by: SCHRISTE

11/21/2019

Representatives Present During the Inspection:

Company	Gregg Galecki
Company	Ryan Wilson
OSM	Tom Medlin
OGM	Todd Miller
Company	Vicky Miller
OGM	Steve Christensen
OGM	Amanda Daniels
OGM	Justin Eatchel
Company	Chris Hansen

Permittee: **CANYON FUEL COMPANY**

Operator: **CANYON FUEL COMPANY**

Site: **GORDON CREEK 2, 7 & 8 MINES**

Address: **HC 35 BOX 380, HELPER UT 84526**

County: **CARBON**

Permit Type: **PERMANENT COAL PROGRAM**

Permit Status: **INACTIVE**

Current Acreages

179.27	Total Permitted
34.15	Total Disturbed
32.52	Phase I
32.52	Phase II
0.73	Phase III

Mineral Ownership

- ☒ Federal
☐ State
☐ County
☒ Fee
☐ Other

Types of Operations

- ☒ Underground
☐ Surface
☐ Loadout
☐ Processing
☐ Reprocessing

Report summary and status for pending enforcement actions, permit conditions, Division Orders, and amendments:

DOGM staff met with mine representatives, OSM personnel, and private landowner Mark Jacobs on Oct. 31, 2019 to perform an inspection of the Gordon Creek 2, 7 and 8 mine site for potential Phase III bond release of the remaining 34.15 acres of surface disturbance. OGM Engineer Justin Eatchel conducted his inspection on Oct. 24, 2019 and has provided comment and photos on this report.

Inspector's Signature: **Todd Miller**

Digitally signed by Todd Miller
DN: cn=Todd Miller, o=ou,
email=todd.miller@utah.gov, c=US
Date: 2019.11.21 09:53:41 -07'00'

Todd Miller,

Inspector ID Number: 76

Date Wednesday, November 14, 2019



1594 West North Temple, Suite 1210, PO Box 145801, Salt Lake City, UT 84114-5801
Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas and Mining.
telephone (801) 538-5340 • facsimile (801) 359-3940 • TTY (801) 538-7458 • www.ogm.utah.gov

Permit Number: C0070016
Inspection Type: BOND RELEASE
Inspection Date: Thursday, October 31, 2019

Inspection Continuation Sheet

Page 2 of 5

Permit Number: C0070016
 Inspection Type: BOND RELEASE
 Inspection Date: Thursday, October 31, 2019

Inspection Continuation Sheet

Page 3 of 5

REVIEW OF PERMIT, PERFORMANCE STANDARDS PERMIT CONDITION REQUIREMENTS

1. Substantiate the elements on this inspection by checking the appropriate performance standard.
 - a. For COMPLETE inspections provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check Not Applicable.
 - b. For PARTIAL inspections check only the elements evaluated.
2. Document any noncompliance situation by reference the NOV issued at the appropriate performance standard listed below.
3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
4. Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

	Evaluated	Not Applicable	Comment	Enforcement
1. Permits, Change, Transfer, Renewal, Sale	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Signs and Markers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Topsoil	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.a Hydrologic Balance: Diversions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.b Hydrologic Balance: Sediment Ponds and Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.c Hydrologic Balance: Other Sediment Control Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.d Hydrologic Balance: Water Monitoring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.e Hydrologic Balance: Effluent Limitations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Explosives	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Disposal of Excess Spoil, Fills, Benches	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Coal Mine Waste, Refuse Piles, Impoundments	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Noncoal Waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. Protection of Fish, Wildlife and Related Environmental Issues	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Slides and Other Damage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Contemporaneous Reclamation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Backfilling And Grading	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13. Revegetation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
14. Subsidence Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15. Cessation of Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16.a Roads: Construction, Maintenance, Surfacing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16.b Roads: Drainage Controls	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Other Transportation Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Support Facilities, Utility Installations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. AVS check	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Air Quality Permit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Bonding and Insurance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.a Hydrologic Balance: Diversions

The Gordon Creek 2, 7, & 8 permit area contains a main drainage channel traveling the length of the permit area, and has 7 side drainages that join with this channel. Of these drainages, SD-6, required some repair work in 2016 after a storm that greatly exceeded a 100-year, 6 hour precipitation event. However during the inspection, the drainages appeared stable and in good condition.

4.b Hydrologic Balance: Sediment Ponds and Impoundments

The reclaimed mine site contains one small pond that is remaining in place. Designated as "Jacob's Pond" a depression acts as a small stock watering pond and is fed by an adjacent natural seep. Jacob's Pond appeared to be in good condition and the water was frozen over during the inspection.

4.d Hydrologic Balance: Water Monitoring

The Gordon Creek 2, 7, & 8 mine has had many years of post-mining water monitoring. Specifically, 4 stream sites have been monitored quarterly for well over 20 years. This monitoring has not shown any impacts from mining.

4.e Hydrologic Balance: Effluent Limitations

There is not an active UPDES permit associated with the mine site.

7. Coal Mine Waste, Refuse Piles, Impoundments

The location of buried coal mine waste on Plate 3-7 was physically inspected to determine if the waste had managed to resurface through the action of erosion and/or rilling. The entire area was walked and inspected for the remnants of coal or coal mine waste but no signs were present. The entire surface appeared stable and mature native vegetation had been established.

8. Noncoal Waste

Noncoal waste was not observed anywhere on the site.

10. Slides and Other Damage

A small section above Jacob's Pond appears to be saturated by a seep that continually flows from the steeper part of the slope overlooking the pond. The water that flows from the seep flows toward Jacob's Pond, and has periodically saturated sections of the hillside along the way. It appears that the slopes have remained stable due to the abundance of grasses and other vegetation that have taken hold in this area.

12. Backfilling And Grading

Disturbed areas appeared stable and graded to achieve approximate original contour. There were no spoil piles present, and the surface had been contoured in an effort to eliminate highwalls and depressions.

13. Revegetation

Vegetation was still mostly visible despite the 3-4" of snow on the ground. From a visual inspection standpoint, the site appeared consistent with the quantitative assessment numbers provided in the bond release application. The vegetation was well established and represented an effective diversity of plants for the post mining land use of grazing.

14. Subsidence Control

There does not appear to be any signs of depressions and/or cracks due to subsidence anywhere within the disturbed areas.

16.a Roads: Construction, Maintenance, Surfacing

There are no roads remaining within the disturbed area. The places where there appeared to be roads in the past have been fully reclaimed and native vegetation has been established.

21. Bonding and Insurance

The current reclamation bond on file with the Division amounts to \$171,000 and is held through Ironshore Indemnity Inc. Liability insurance is provided through Great Midwest Insurance Co., and is set to expire on February 1, 2020. Once approved for Phase III bond release, the \$171,000 will be released to the Permittee.

ATTACHMENT A – Photos October 24 & 31, 2019 site visit

PHOTO 1

October 24, 2019


PHOTO 2

October 24, 2019


PHOTO 3

October 24, 2019


PHOTO 4

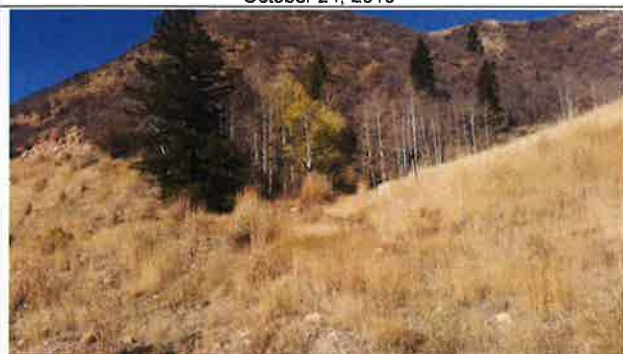
October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit**PHOTO 5**

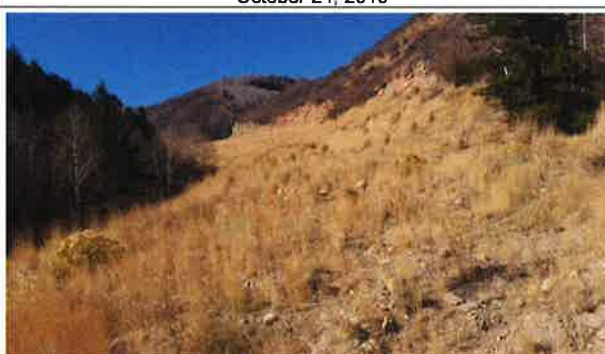
October 24, 2019

**PHOTO 6**

October 24, 2019

**PHOTO 7**

October 24, 2019

**PHOTO 8**

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit**PHOTO 9**

October 24, 2019

**PHOTO 10**

October 24, 2019

**PHOTO 11**

October 24, 2019

**PHOTO 12**

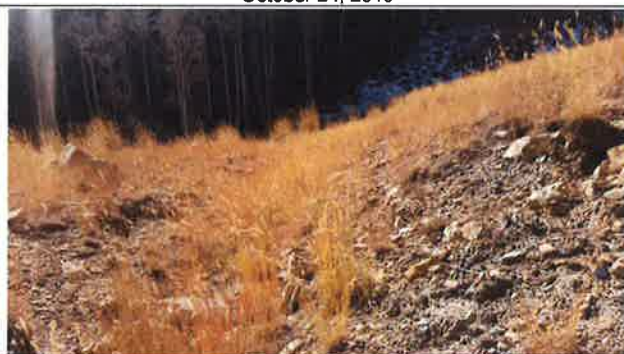
October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit**PHOTO 13**

October 24, 2019

**PHOTO 14**

October 24, 2019

**PHOTO 15**

October 24, 2019

**PHOTO 16**

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit



PHOTO 17

October 24, 2019



PHOTO 18

October 24, 2019



PHOTO 19

October 24, 2019



PHOTO 20

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit**PHOTO 21**

October 24, 2019

**PHOTO 22**

October 24, 2019

**PHOTO 23**

October 24, 2019

**PHOTO 24**

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit

PHOTO 25

October 24, 2019


PHOTO 26

October 24, 2019


PHOTO 27

October 24, 2019


PHOTO 28

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit

PHOTO 25

October 24, 2019


PHOTO 27

October 24, 2019


PHOTO 28

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit**PHOTO 25**

October 24, 2019

**PHOTO 26**

October 24, 2019

**PHOTO 27**

October 24, 2019

**PHOTO 28**

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit

PHOTO 25

October 24, 2019


PHOTO 26

October 24, 2019


PHOTO 27

October 24, 2019


PHOTO 28

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit**PHOTO 25**

October 24, 2019

**PHOTO 26**

October 24, 2019

**PHOTO 27**

October 24, 2019

**PHOTO 28**

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit

PHOTO 25

October 24, 2019


PHOTO 26





October 24, 2019






PHOTO 27

October 24, 2019


ELK SIGN

October 24, 2019

ATTACHMENT A – Photos October 24 & 31, 2019 site visit			
			
FROZEN JACOB'S POND		SEEP ABOVE JACOB'S POND	
October 24, 2019		October 24, 2019	
			
SEEP ABOVE JACOB'S POND		SEEP ABOVE JACOB'S POND	
October 24, 2019		October 24, 2019	

ATTACHMENT A – Photos October 24 & 31, 2019 site visit			
			
SEEP ABOVE JACOB'S POND		SEEP ABOVE JACOB'S POND	
October 24, 2019		October 24, 2019	
			
SEEP ABOVE JACOB'S POND		PHOTO 28	
October 24, 2019		October 31, 2019	

ATTACHMENT A – Photos October 24 & 31, 2019 site visit

PHOTO 25

October 31, 2019


PHOTO 26

October 31, 2019


PHOTO 27

October 31, 2019





United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Green River District

Price Field Office

125 South 600 West

Price, UT 84501

www.blm.gov



NOV 07 2019

In Reply Refer To:
3425 (LLUTG02000)
UDOGM C0070016 Carbon

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

7016 2710 0000 2322 7129

State of Utah
Department of natural Resources
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84116

Attn: Steve Christensen

Re: Phase III Bond Release, Gordon Creek 2, 7 and 8 Mines

Dear Mr. Christensen:

On November 6, 2019, the Bureau of Land Management, Price Field Office (BLM, PFO) conducted a field inspection of the Gordon Creek 2, 7 and 8 Mines (C0070016) in order to determine whether or not the Division's proposed Decision to release Canyon Fuel Co. (CFC) from its reclamation bond could be confirmed. CFC has requested a Phase III reclamation bond release, since it has now been over 10 years since the original reclamation was completed at the mines.

By way of this letter, the BLM confirms the Division's plans to release the bond entirely, and in fact wishes to compliment Canyon Fuel Company on its excellent success in reclamation of the mine site.

If you have any questions, please contact Michael Glasson of this office at (435) 636-3651.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Conrad", written over the printed name.

Chris Conrad
Field Manager

cc: Opolonia Abeyta, UTSO